

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

RONALD LAWRENCE,

Defendant.

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No. 4:22 CR0547 SEP

DEFENDANT'S SENTENCING MEMORANDUM

Mr. Lawrence is requesting a sentence of 20 years(240months) as the punishment for his involvement in this case of two counts of Production of Child Pornography and two counts of Distribution of Child Pornography. Mr. Lawrence recommends this sentence after careful consideration of all the sentencing factors before the Court. The history and characteristics of Mr. Lawrence support this recommendation. Specifically, counsel points out that Mr. Lawrence has no prior criminal history, and this court should consider Ronald's nightmarish childhood, which is described in paragraph 84 of the PSR. As reported by Ronald, his stepfather sexually, emotionally and physically abused him when he was a teenager. On one occasion Ronald was woken up in the middle of the night and beaten with a baseball bat for not cleaning the dishes. Ronald's stepfather pointed load firearms at him, specifically pointing a load rifle at his when he attempted to stop his stepfather from abusing his mother. Ronald had to steal food in order to eat during this time. Both is stepfather and mother were addicted to methamphetamine. He was not provided with the adequate necessities while he lived with them. Additionally, as an eight-year-old, a 17-year-old neighbor sexually abused him, this conduct went on for several years. Ronald's sexual abuse of the girls in this case mirrored the abuse that was perpetrated on

him as a child. Lawrence understands that due to his past he often equates emotional connection to sexual contact. An issue he needs to have help addressing. Also affecting Ronald's childhood was his experience of loss. When he was in grade school his best friend committed suicide.

Ronald has received some mental health counseling for depression, anxiety and PTSD. He has been treated at the Crider Center in Wentzville for those diagnosis. Recently, He has been treated in the St. Charles County Jail for possible Bi-Polar and Aspergers. He requests that this Court order that he participate in Mental Health Counseling while in the Federal Bureau of Prisons. Ronald also has had a physical issue that still affects him. In 2020, he was injured when a Forty-five-pound steel bar hit him in the head and knocked him unconscious. This injury caused him traumatic brain injuries. He still suffers from headaches and vertigo due to this injury.

Ronald realizes the gravity of his conduct. He knows he will be punished for his involvement in this matter. He acknowledges that he should receive a substantial sentence, 20 years is substantial.

CONCLUSION

Mr. Lawrence asks this court to sentence him to the recommendation of 20 years which is below the Guideline Range. The Defendant had a difficult childhood as stated above. Additionally, he has no prior criminal history. For these reasons, Mr. Lawrence asks that this Court follow the recommendation of 20 years. Such a sentence will provide just punishment, protect the public, provide adequate deterrence, and promote respect for the law.

Respectfully submitted,

/s/ Eric Selig
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jillian Anderson, Assistant United States Attorney.

/s/ Eric Selig
ERIC SELIG 40673MO
Assistant Federal Public Defender